UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

INTERNATIONAL ACADEMIC CITY, et al,)
PLAINTIFFS,))) Civil Case No. 1:20-cv-193
V.) CIVII Case IVO. 1.20-cv-193
STRATFORD UNIVERSITY, INC. et al)
DEFENDANTS)

NOTICE OF SETTLEMENT

NOW COMES Plaintiffs/Counterclaim-Defendants International Academic City ("IAC") and Saqi Barzani, by counsel and with the consent of opposing counsel, and files this Notice to inform the Court that the parties have mutually executed a settlement agreement that fully resolves all claims, counterclaims, and other areas of dispute in this litigation between the parties. Counsel for the parties anticipate that a FRCP 41 motion and final dismissal order disposing of the case will soon be filed in the coming days.

Dated: October 26, 2021 Respectfully submitted, /s/ Stephen J. Stine, Esq.

(VSB No. 66738) The Stine Law Firm, PLLC 3900 Jermantown Rd., Suite 300 Fairfax, VA 22030-4900

Office Phone: 703-934-4647 Ext. 326

Cell Phone: (703) 201-5075 Fax: (703) 991-6559

Email: stine@stinelaw.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on the 26th day of October, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following filing user(s):

Harold E. Johnson (VSB No. 65591) Justin S. Feinman (VSB No. 87511) WILLIAMS MULLEN, P.C. 200 South 10th Street, 16th Floor Richmond, Virginia 23219 (804) 420-6000 (804) 420-6507 (facsimile) hjohnson@williamsmullen.com jfeinman@williamsmullen.com

Counsel for Defendants

/s/ Stephen J. Stine